

# **EXHIBIT B**

## Complaint Against Plaintiff Wolferd, 12.15.04 (Complaint at ¶ 79)

009 10:31 From:

To: 18562222912

P.5/9

6. The following amounts are due on the mortgage:

Principal Balance	\$119,642.93
Interest 05/01/2004 through 12/14/2004 (Per Diem \$22.34)	5,093.52
Attorney's Fees	1,250.00
Cumulative Late Charges 03/29/2001 to 12/14/2004	0.00
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 126,536.45
Escrow	
Credit	0.00
Deficit	209.52
Subtotal	<u>\$ 209.52</u>
<b>TOTAL</b>	\$ 126,745.97

7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.

8. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

9. This action does not come under Act 91 of 1983 because the mortgage is FHA-insured.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 126,745.97, together with interest from 12/14/2004 at the rate of \$22.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIDEG  
 By: Francis S. Hallinan  
 LAWRENCE T. PHELAN, ESQUIRE  
 FRANCIS S. HALLINAN, ESQUIRE  
 Attorneys for Plaintiff

**Cover Sheet for Action Against Plaintiff Wolferd, 12.15.04 (Complaint at ¶ 79)**

LANCASTER COUNTY 04-11635

OFFICE OF THE PROTHONOTARY COURT OF COMMON PLEAS - CIVIL

**CIVIL COVER SHEET**

NAME, ADDRESS AND TELEPHONE NUMBER OF PLAINTIFF'S ATTORNEY:

FRANCIS S. HALLINAN, ESQUIRE  
SUITE 1400, ONE PENN CENTER  
PHILADELPHIA, PA, 191023  
(215) 563-7000

ATTORNEY'S SIGNATURE: F. S. Hallinan  
IDENTIFICATION #: 62695

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY

Court Administration Office

**SCHEDULING INFORMATION ONLY**

HEARING/CONFERENCE - LENGTH OF TIME (MIN/IRS): \_\_\_\_\_

SPECIAL INSTRUCTIONS: \_\_\_\_\_

File #: 108563

**Suggestion of Record Change in *Wolferd* Action, 7.8.09, Complaint at ¶ 87**

Phelan Hallinan & Schmieg, LLP  
Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
Michele M. Bradford, Esq., Id. No. 69849  
Judith T. Romano, Esq., Id. No. 58745  
Sheetal R. Shah-Jani, Esq., Id. No. 81760  
Jenine R. Davey, Esq., Id. No. 87077  
Lauren R. Tabas, Esq., Id. No. 93337  
Vivek Srivastava, Esq., Id. No. 202331  
Jay B. Jones, Esq., Id. No. 86657  
Peter J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq. I.D. 208375  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

ENTERED AND FILED  
2009 JUL -8 AM 11:42  
PROTHONOTARY'S OFFICE  
LANCASTER, PA

WELLS FARGO BANK, N.A. S/B/M TO WELLS : LANCASTER COUNTY  
FARGO HOME MORTGAGE, INC. : COURT OF COMMON PLEAS  
vs. : CIVIL DIVISION  
EDWARD H. WOLFRED, JR. : No.CI-04-11635

**SUGGESTION OF RECORD CHANGE**  
**RE: CORRECTION OF DEFENDANT'S NAME**

TO THE PROTHONOTARY:

I, the attorney for the Plaintiff, hereby certify that, to the best of my knowledge, information and belief that the defendant's name was erroneously listed in the caption as:

**EDWARD H. WOLFRED, JR.**

Kindly change the information on the docket to read as follows:

**EDWARD H. WOLFRED, JR. A/K/A EDWARD H. WOLFERD, JR.**

DATE: 7/2/2009

PHELAN HALLINAN & SCHMIEG, LLP

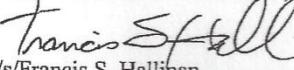
By: St. Halle  
Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
Michele M. Bradford, Esq., Id. No. 69849  
Judith T. Romano, Esq., Id. No. 58745  
Sheetal R. Shah-Jani, Esq., Id. No. 81760  
Jenine R. Davey, Esq., Id. No. 87077  
Lauren R. Tabas, Esq., Id. No. 93337  
Vivek Srivastava, Esq., Id. No. 202331  
Jay B. Jones, Esq., Id. No. 86657  
Peter J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq. I.D. 208375  
Attorneys for Plaintiff

**Complaint Against Plaintiff Rhodes, 9.7.11 (Complaint at ¶ 104)**

9. The mortgage premises are vacant and abandoned.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$35,154.47, together with interest from 09/14/2007 at the rate of \$10.28 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

  
By: /s/Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

## Purported "Assignment" of Rhodes' Mortgage, 11.17.07 (Complaint at ¶ 110)

REC BK05264-PG0840

2007070935 11/29/2007 03 52 06 PM 1  
RCD FEE \$29.50

ASSIGNMENT OF MTG

PAGE 1 of 3

BERKS  
COUNTY ROD

ELLIE ANTOINE ROD

ASSIGNMENT OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS that "Mortgage Electronic Registration Systems Inc" hereinafter "Assignor" the holder of the Mortgage hereinafter mentioned, for and in consideration of the sum of ONE DOLLAR (\$1 00) lawful money unto it in hand paid by Bank of New York as trustee for the Certificateholders of CWABS Inc Asset Backed Certificates Series 2005-05, "Assignee" the receipt whereof is hereby acknowledged, does hereby grant, bargain ,sell, assign, transfer and set over unto the said Assignee, , its successors and assigns, ALL THAT CERTAIN Indenture of Mortgage given and executed by Dennis A Rhodes to Mortgage Electronic Registration Systems Inc as a nominee for Countrywide Home Loans Inc, bearing the date 04/14/05, in the amount of \$32,300.00, together with the Note and indebtedness therein mentioned, said Mortgage being recorded on 06/13/05 in the County of Berks, Commonwealth of Pennsylvania, in Mortgage Book 4600 Page 2434, .  
Being Known as Premises 1748 Cotton Street, Reading PA 19606  
Parcel No 15-5316-32-47-7694

Also the Bond or Obligation in the said Indenture of Mortgage recited, and all Moneys, Principal and Interest, due and to grow due thereon, with the Warrant of Attorney to the said Obligation annexed Together with all Rights, Remedies and incidents thereunto belonging And all its Right, Title, Interest, Property, Claim and Demand, in and to the same

TO HAVE, HOLD, RECEIVE AND TAKE, all and singular the hereditaments and premises hereby granted and assigned, or mentioned and intended so to be, with the appurtenances unto Assignee, its successors and assigns, to and for its only proper use, benefit and behoof forever, subject, nevertheless, to the equity of redemption of said Mortgagor in the said Indenture of Mortgage named, and his/her/their heirs and assigns therein

IN WITNESS WHEREOF, the said "Assignor" has caused its Corporate Seal to be herein affixed and these presents to be duly executed by its proper officers this 17 day of November, 2007

Mortgage Electronic Registration Systems Inc

By Francis S Hallinan  
Francis S Hallinan Esq, Assistant Vice President & Secretary

Attest \_\_\_\_\_

Sealed and Delivered  
in the presence of us,

State of PA  
County of Berks  
ss

On this 17 day of November, 2007 before me, the subscriber, personally appeared Francis S Hallinan Esq, who acknowledged him/herself to be the Assistant Vice President & Secretary of Mortgage Electronic Registration Systems Inc, and that he/she, as such Assistant Vice President & Secretary, being authorized to do so, executed the foregoing instrument for the purposes therein contained

IN WITNESS WHEREOF, I hereunto set my hand and official seal

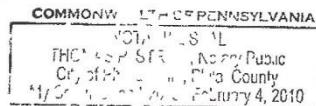
Thom JHC

Notary Public

Stamp/Seal:

The precise address of the  
within named Assignee is  
7105 Corporate Dr  
Plano TX 75024  
By 17  
(For Assignee)

After recording return to:  
Phelan, Hallinan and Schmeg LLP  
One Penn Center  
1617 J.F.K. Blvd., Ste.1400  
Philadelphia, PA 19103-1814

11/17/07-JHC  
Doc Request  
98826237

**Purported "Assignment" of Victor Ukpe Mortgage (Complaint at ¶¶ 201-209)**

Case 1:09-cv-01710-JHR-JS Document 31-6 Filed 09/08/09 Page 4 of 4 PageID: 682

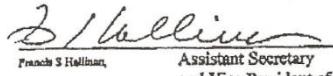
06/16/2008 15:48 FAX 16098890559

JEREMY TRECHOCK

003/003

*I AGREE TO THE TERMS OF THIS ASSIGNMENT.*

*Witnessed or Attested by:*

  
Francis S Hallinan

Assistant Secretary  
and Vice President of

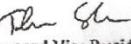
Mortgage Electronic Registration Systems Inc as a nominee for America's Wholesale  
Lender its successors and assigns

**NOTARY ACKNOWLEDGMENT**

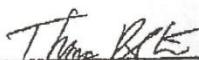
**CAPACITY CLAIMED BY SIGNER:** Assistant Secretary and Vice President

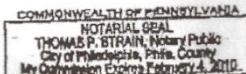
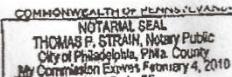
**OF** Mortgage Electronic Registration Systems Inc as a nominee for America's  
Wholesale Lender its successors and assigns

**STATE OF Pennsylvania**  
**COUNTY OF Philadelphia**

On, 3/17/10, before me,  a Notary Public, personally  
appeared Francis S Hallinan Assistant Secretary and Vice President, who proved to me on the  
basis of satisfactory evidence to be the person whose name is subscribed to the within instrument  
and acknowledged that he/she executed the same in her authorized capacity and that by her  
signature on the instrument, the entity upon behalf of which the person acted executed the  
instrument.

*WITNESS my hand and official seal.*

  
Notary Public



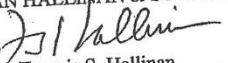
**Complaint Against Plaintiff Bender, 6.27.07 (Complaint at ¶¶ 120-121)**

Case 08-21193-ref Doc 56-3 Filed 06/26/09 Entered 06/26/09 16:26:32 Desc  
Exhibit Page 22 of 30

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$78,017.75, together with interest from 06/22/2007 at the rate of \$22.48 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

  
By: /s/ Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

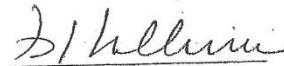
**"Verification" Attached to Bender Complaint, 6.22.07 (Complaint at ¶123)**

Case 08-21193-ref Doc 56-3 Filed 06/26/09 Entered 06/26/09 16:26:32 Desc  
Exhibit Page 25 of 30

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that he is authorized to make this verification pursuant to Pa.R.C.P. 1024 (c), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of its knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

The undersigned understands that this statement is made subject to the penalties of 18 Pa.C.S. Sec. 4904 relating to unsworn falsifications to authorities.

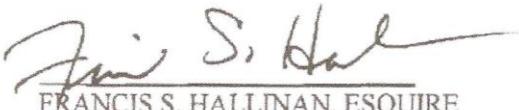
  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

DATE: 10/22/07

**Affidavit Dated January 7, 2008 in *First Horizon Loan Corp. v. Texiera*,  
Docket No. 3:06-cv-00791-EMK (M.D.Pa.)**

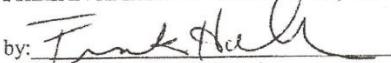
I verify that the statements made in this Affidavit are true and correct to the best of my knowledge, information or belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. \*4904, relating to sworn falsification to authorities.

January 7, 2008  
Date

  
FRANCIS S. HALLINAN, ESQUIRE

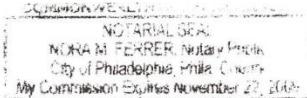
**Affidavit Dated July 1, 2006 in *First Horizon Loan Corp. v. Texiera*,  
Docket No. 3:06-cv-00791-EMK (M.D.Pa.)**

PHELAN HALLINAN & SCHMID, LLP

by:   
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

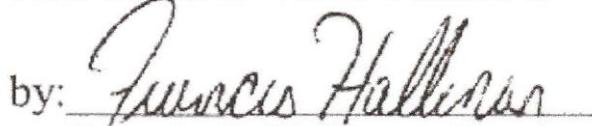
Sworn to and Subscribed  
Before Me this 1st  
day of July, 2006

Nora M. Ferrer  
Notary Public



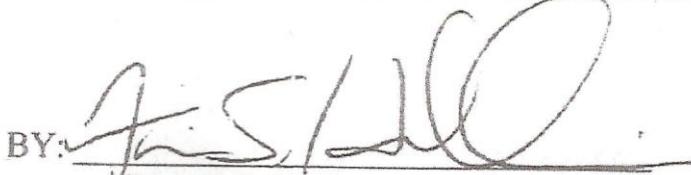
**Affidavit of Amount Due in *Federal Home Loan Mortgage Corp. v. Harroll*,  
Docket No. 4:04-cv-00363 (M.D.Pa.)**

FEDERMAN AND PHELAN

by:   
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

**Notice of Dismissal Filed in *Wells Fargo Bank, N.A. v. Connor*,  
Docket No. 1:05-cv-02673-YK (M.D.Pa.)**

PHELAN HALLINAN & SCHMIEG, LLP

BY:   
Francis S. Hallinan, Esquire  
Attorney ID No. 62695  
One Penn Center at Suburban Station  
1617 JFK Blvd., Suite 1400  
Philadelphia, PA 19013  
P: 215-563-7000

**Praecipe to Reissue Summons in *Mortgage Electronic Registration Systems, Inc. v. Vega*, Docket No. 3:04-cv-02571-RPC (M.D.Pa.)**

PHELAN, HALLINAN & SCHMIEG LLP

BY:   
Francis S. Hallinan, Esquire  
Attorney ID No. 62695  
One Penn Center at Suburban Station  
1617 JFK Blvd., Suite 1400  
Philadelphia, PA 19013  
P: 215-563-7000